

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 13 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
THOMAS C. WRIGHT, M.D. FOR WAVE 13**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Thomas C. Wright for Ethicon Wave 1, Dkt. 1986 (motion), Dkt. 1988 (memorandum in support) and the reply brief filed for Ethicon Wave 4, Dkt. 3844 (reply). Plaintiffs respectfully request that the Court exclude Thomas C. Wright's testimony, for the reasons expressed in the Wave 1 and 4 briefing. This notice applies to the following Wave 13 cases identified in Exhibit A attached hereto.

Dated: December 12, 2019

Respectfully submitted,

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EXHIBIT A

Dimico-Wilson, Cynthina & John Kelly	14cv28545
Grover, Michelle & Robert	14cv28383
Lim, Deserie	13cv06974
Macknis, Rita & Michael	16cv10467
Perez, Marinet & Edward	13cv30047
Schulte, Tamara & Timothy	14cv28515
Staigmiller, Marlene (deceased)	14cv28539

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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